IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF TEXAS SHERMAN DIVISION

YOUNG CONSERVATIVES OF TEXAS	§
FOUNDATION	§
	§
Plaintiff,	§
	§ CIVIL ACTION NO. 4:20-cv-00973
V.	§
	§
THE UNIVERSITY OF NORTH TEXAS,	§
THE UNIVESITY OF NORTH TEXAS	§
SYSTEM, NEAL SMATRESK,	§
PRESIDENT OF THE UNIVERSITY OF	§
NORTH TEXAS and SHANNON	§
GOODMAN, VICE PRESIDENT FOR	§
ENROLLMENT OF THE UNIVERSITY	§
OF NORTH TEXAS,	§
	§
Defendant.	§

JOINT MOTION TO STAY DEADLINES

Defendants, the University of North Texas, the University of North Texas System, Neal Smatresk, President of the University of North Texas, and Shannon Goodman, Vice President for Enrollment of the University of North Texas (collectively "UNT" or "Defendants"), jointly with Plaintiff, Young Conservatives of Texas Foundation ("YCTF" or "Plaintiff"), respectfully submit this Joint Motion to Stay Deadlines.

The Parties are in receipt of the Court's Order and Advisory and Order Governing Proceedings both entered on January 22, 2021. Dkt. Nos. 10-11. The Parties agree that the Orders are intended to stay deadlines on previously filed motions pending the Courts decision on YCTF's Motion to Remand. Dkt. No. 12. The Parties, therefore, request a stay on the following deadlines until the Court decides YCTF's Motion to Remand:

- 1. All responses and replies to Plaintiff's Motion for Summary Judgment. Dkt. No. 6.
- 2. All responses and replies to Defendants' Motion to Dismiss Pursuant to Rules 12(b)(1) and (6). Dkt. No. 7.

This request for a stay is not sought for purposes of delay and will not prejudice any party to this action.

The Parties respectfully request this Honorable Court enter an Order granting a stay on the above deadlines pending in this case,

Respectfully submitted,

By: /s/ Andy Taylor

Andy Taylor

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ATTORNEYS FOR THE DEFENDANTS
UNIVERSITY OF NORTH TEXAS, THE
UNIVERSITY OF NORTH TEXAS SYSTEM,
NEAL SMATRESK, PRESIDENT OF THE
UNIVERSITY OF NORTH TEXAS, AND
SHANNON GOODMAN, VICE PRESIDENT FOR
ENROLLMENT OF THE UNIVERSITY OF
NORTH TEXAS

-and-

TEXAS PUBLIC POLICY FOUNDATION

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CERTIFICATE OF SERVICE

I certify that a copy of the foregoing Joint Motion to Stay Deadlines has been electronically filed by the CM/ECF system on this the 25th day of January, 2021 to all counsel of record.

By: <u>/s/ Sandy Hellums-Gomez</u> Sandy Hellums-Gomez

CERTIFICATE OF CONFERENCE

I certify that counsel for the Parties have conferred and are in agreement with this Joint Motion to Stay Deadlines.

By: /s/ Sandy Hellums-Gomez
Sandy Hellums-Gomez